

REMARKS

Applicants acknowledge receipt of the Final Office Action mailed August 6, 2007.

In the Final Office Action, the Examiner rejected claims 1, 4, and 5 under 35 U.S.C. § 103(a) as being unpatentable over *Morgavi* (U.S. Patent No. 6,562,413) in view of *Ikemoto et al.* (U.S. Patent Pub. No. 2001/0020960).

In this Amendment, Applicants amend claims 1, 4, and 5, and add new claim 8. Upon entry of this Amendment, claims 1, 4, 5, and 8 will be pending. Of these claims, claim 1 is independent. Claim 2 was previously canceled in the Amendment filed July 5, 2006; claim 3 was previously canceled in the Amendment After Final filed December 7, 2006; and claims 6 and 7 were previously canceled in the Amendment filed May 22, 2007.

The originally-filed specification, claims, abstract, and drawings fully support the amendments to claims 1, 4, and 5, and the addition of claim 8. No new matter has been introduced.

Based on the foregoing amendments and the arguments that follow, Applicants traverse the rejection above and respectfully request reconsideration for at least the reasons set forth below.

I. 35 U.S.C. § 103(a) REJECTION

Claims 1, 4, and 5 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Morgavi* in view of *Ikemoto*. Applicants respectfully disagree with the Examiner's arguments and conclusions and submit that independent claim 1 is patentably distinguishable over *Morgavi* and *Ikemoto* at least for the reasons set forth below.

In order to establish a *prima facie* case of obviousness under 35 U.S.C. §103(a), each of three requirements must be met. First, the reference or references, taken alone or combined, must teach or suggest each and every element recited in the claims. Second, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to combine the references in a manner resulting in the claimed invention. Third, a reasonable expectation of success must exist. Moreover, each of the three requirements must "be found in the prior art, and not be based on applicant's disclosure." See M.P.E.P. §2143, 8th ed., February 2003.

Morgavi appears to disclose a known technique for multicolor printing by inkjet in FIG. 2. The printing device includes "[s]everal reservoirs 21, 22, 23, and 24 containing...[a] black polymer ink and those of different colours[, which] feed at least one nozzle ejecting drops of ink...", and four ultraviolet lamps 25, 26, 27, and 28 for drying each ink individually (emphases added). (*Morgavi*, col. 1, ll. 54-55 and col. 2, ll. 1-4 and 20-22).

However, as admitted by the Examiner, *Morgavi*, at least, does not explicitly disclose "{claim 1} that the ink reservoirs 21-24 contain a plurality [of] printing heads..." (*Final Office Action*, p. 4). In addition, *Morgavi* fails to teach or suggest a first light radiating device including a plurality of first light sources and a second light radiating device including a plurality of second light sources, wherein the plurality of first light sources and the plurality of second light sources are staggered perpendicular to the conveyance direction of the recording medium sheet and correspond to each of a plurality of first printing heads and a plurality of second printing heads, respectively.

To cure the deficiencies of *Morgavi*, the Examiner relies on *Ikemoto* and alleges that “Ikemoto et al discloses...a full line print head containing a plurality of head chips...” (*Final Office Action*, p. 5).

Ikemoto appears to disclose an ink-jet printer having high resolution and image quality, low power consumption, low cost, and a plurality of line heads. The ink-jet printer emits droplets of ink arriving as ink dots forming images and letters recorded onto a recording medium from a line head having a plurality of nozzles arrayed in the width direction of the recording medium. The printer comprises head chips having a specified number of nozzles and a drive circuit to drive each nozzle. (*Ikemoto*, Abstract).

Ikemoto, however, fails to disclose a first light radiating device including a plurality of first light sources and a second light radiating device including a plurality of second light sources, wherein the plurality of first light sources and the plurality of second light sources are staggered perpendicular to the conveyance direction of the recording medium sheet and correspond to each of a plurality of first printing heads and a plurality of second printing heads, respectively.

As disclosed in Applicants' specification at page 17, lines 3-7, “[o]n first light radiating device 17 and second light radiating device 18 shown in Fig. 2, a plurality of light source[s] for radiating the light are staggered perpendicular to conveyance direction X, and correspond to each of plural unit heads U.”

Accordingly, with respect to independent claim 1, *Morgavi* and *Ikemoto* fail to teach or suggest the claimed combination, including, *inter alia*:

“a first light radiating device including a plurality of first light sources...; and a second light radiating device including a plurality of second light sources..., wherein the plurality of first light sources and the plurality of second light sources are staggered perpendicular to the conveyance direction of the recording medium sheet and correspond to each of [a] plurality of first printing heads and [a] plurality of...second printing heads, respectively.”

The Examiner has therefore not met at least one of the essential criteria for establishing a *prima facie* case of obviousness, wherein “the prior art reference (or references when combined) must teach or suggest all the claim limitations.” See M.P.E.P. §§ 2142, 2143, and 2143.03. Accordingly, independent claim 1, and corresponding dependent claims 4 and 5, are patentable over *Morgavi* and *Ikemoto*. Applicants therefore request that the rejection of claims 1, 4, and 5 under 35 U.S.C. § 103(a) be withdrawn and claims 1, 4, and 5 be allowed.

II. NEW CLAIMS

New claim 8 depends from claim 1 and is allowable at least for the same reasons claim 1 is allowable. In addition, the dependent claim recites unique combinations that are neither taught nor suggested by the cited art, and therefore is also separately patentable.

III. CONCLUSION

Applicants respectfully submit that claims 1, 4, 5, and 8 are in condition for allowance.

The Office Action contains characterizations of the claims and the related art with which Applicants do not necessarily agree. Unless expressly noted otherwise, Applicants decline to subscribe to any statement or characterization in the Office Action.

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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